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CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____

DEPUTY CLERK
UNITED STATES OF AMERICA,

v.

TODD RICKS,

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

Criminal No. 1:06-cr-00206-LY-1

FILED

NOV 22 2021

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____
DEPUTY CLERK

**MOTION FOR EXTENSION OF TIME TO REPLY TO GOVERNMENT'S RESPONSE
TO DEFENDANT'S SENTENCE-REDUCTION MOTION**

COMES Defendant, Todd Ricks ("Ricks"), appearing *pro se*, and files his Motion for Extension of Time to Reply to Government's Response to Defendant's Sentence-Reduction Motion, and would show as follows:

PRELIMINARY STATEMENT

As a preliminary matter, Ricks respectfully requests that this Court be mindful that *pro se* pleadings are to be construed liberally. See *United States v. Kayode*, 777 F.3d 719 (5th Cir. 2014) ("*Pro se* pleadings are held to a less stringent standard than pleadings drafted by attorneys and will, therefore, be liberally construed."); *Estelle v. Gamble*, 429 U.S. 97, 106 (1976) (same); and *Haines v. Kerner*, 404 U.S. 519, 520 (1972) (same).

REASON FOR EXTENSION


The fourteen (14) page United States' Response in Opposition to Defendant's Motion for Compassionate Release ("USR") was just received by Ricks through the prison mail. Because of the Covid/Delta Virus pandemic the compound at FCI Bastrop has had limited movement and very limited access to the prison law library. As such, Ricks needs to research, prepare and perfect his

Reply to the USR. Therefore, he seeks a thirty (30) day extension of time, up to and including December 18, 2021, to complete his Reply.

WHEREFORE, premise considered, Ricks prays that the Court grant this motion and extend his deadline for filing his Reply, up to and including December 10, 2021.

Respectfully submitted,

Dated: November 18, 2021



TODD RICKS
REG. NO. 83035-180
FCI BASTROP
FEDERAL CORR. INSTITUTION
P.O. BOX 1010
BASTROP, TX 78602

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2021, I mailed a true and correct copy of the above and foregoing Motion for Extension of Time to Reply to United States' Response in Opposition to Defendant's Motion for Compassionate Release, postage prepaid, to Michelle Evette Fernald, Assistant United States Attorney, 903 San Jacinto Blvd., Suite 334, Austin, TX 78701.



TODD RICKS

TODD RICKS
REG. NO. 83035-180
FCI BASTROP
FEDERAL CORR. INSTITUTION
P.O. BOX 1010
BASTROP, TX 78602

November 10, 2021

Clerk, U.S. District Court
Western District of Texas
Austin Division
501 West Fifth Street, Suite 1100
Austin, Texas 78701

RE: *Ricks v. United States*
Crim No. 1:06-cr-00206-LY-1

To the Clerk of the Court:

Enclosed please find and accept for filing Movant's Motion for Extension of Time to File Reply to Government's Response to Compassionate Release pursuant to 18 U.S.C. § 3582(c)(1)(A) and First Step Act of 2018. Please submit this motion to the Court.

Thank you for your assistance in this matter.

Sincerely,



TODD RICKS
Appearing *Pro Se*

Encl. as noted

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NOV 22 2021

TODD RICKS
REG. NO. 83035-180
FCI BASTROP
FEDERAL CORR. INSTITUTION
P.O. BOX 1010
BASTROP, TX 78602

TO:

Clerk, U.S. District Court
Western District of Texas
Austin Division
501 West Fifth Street, Suite 1100
Austin, Texas 78701-78701